

From: Ambre Gooch ACG@czwlaw.com

Subject: RE: Sanders v. Turn Key

Date: March 16, 2021 at 8:13 AM

To: Colton L. Richardson colton@rrbok.com

Cc: clr@rrbok.com, ayoung@johnsonhanan.com, ssnyder@johnsonhanan.com, Michael L. Carr MLC@czwlaw.com, Gaye L Price GLP@czwlaw.com, Carrie Todd CMT@czwlaw.com, Stacy Stark sds@rrbok.com, Dhana Anderson DDA@czwlaw.com

AG

I am still trying to get both parties to this case to agree, in writing, to the parameters of the inspection, and I have yet to obtain such agreement in writing from both parties. I understand the date of the inspection is at issue and the number of persons to attend per party is at issue. Otherwise, I understand that items A-I are agreeable to the parties:

A) No video or audio recording of anything is allowed; only still photos are allowed to be taken.

B) Photos taken by any party are protected as confidential via the PO in this case at Doc. 36

C) Photos taken by any party will be conspicuously marked as CONFIDENTIAL prior to production to each other (they should NOT be produced to anyone else) or filing AND WILL BE produced to me within 48 hours of the inspection.

D) No talking to staff or inmates will be permitted.

E) No Jail staff or inmates will be allowed to be in the photos that are taken.

F) The parties have agreed to the inspection occurring after the present date of discovery cutoff.

G) The persons who will participate in the inspection must pass a criminal background prior to the inspection; this criminal background check will be done by the Jail prior to the inspection. Thus, the name, DOB, and SS# of the persons who attend the inspection must be provided to me in advance of the inspection with sufficient time to allow the background check to be conducted.

H) If the Jail determines that COVID19 is still a health and/or safety issue, COVID precautions will be in place which the persons doing the inspection have to follow and submit to.

I) The following areas ONLY will be inspected: 1) booking room; 2) cell(s) in which Decedent was housed during her incarceration at issue in this case only; 3) sally port where ambulance arrived/departed with Decedent, including the hallway to/from sallyport; and, 4) medical office which is located as part of the booking room.

To confirm we are all on the same page, I request that counsel for each party respond to this email to confirm he/she agrees to items A-I above. The inspection will NOT proceed without Court Order, if both parties have not responded to this email advising he/she agrees to items A-I above.

From: Ambre Gooch <ACG@czwlaw.com>

Sent: Monday, March 15, 2021 9:32 AM

To: Colton L. Richardson <colton@rrbok.com>

Cc: clr@rrbok.com; ayoung@johnsonhanan.com; ssnyder@johnsonhanan.com; Michael L. Carr <MLC@czwlaw.com>; Gaye L Price <GLP@czwlaw.com>; Carrie Todd <CMT@czwlaw.com>; Stacy Stark <sds@rrbok.com>; Dhana Anderson <DDA@czwlaw.com>

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